

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROBERT MELOCK,	)	
	)	
Plaintiff,	)	Case No. 1:24-cv-12679
	)	
v.	)	
	)	The Honorable Sunil R. Harjani
CITY OF WAUKEGAN, LUCIAN TESSMAN,	)	
DONALD MEADIE, DAVID YARC, MICHAEL	)	
TAYLOR, JANET E. KILKELLY as special	)	
representative of the ESTATE OF ROBERT	)	
WINSTON, KEVIN RUNYARD, JANET E.	)	
KILKELLY as special representative of the	)	
ESTATE OF RICHARD DAVIS, PHILIP	)	
STEVENSON, PATRICK HALEY, JOHN	)	
REID & ASSOCIATES, INC., MICHAEL	)	
MASOKAS, and MARK REID,	)	
	)	
Defendants.	)	

**DEFENDANTS' JOINT UNOPPOSED MOTION  
TO MODIFY COURT'S FEBRUARY 19, 2025 (DKT. 41) DISCOVERY SCHEDULE**

Defendants, City of Waukegan, Lucian Tessman, Donald Meadie, David Yarc, Michael Taylor, Robert Winston, Kevin Runyard, Richard Davis, Philip Stevenson, Patrick Haley ("Waukegan Defendants"), John Reid & Associates, Inc., Michael Masokas, and Mark Reid ("John Reid Defendants") (collectively "Defendants") pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), move this Honorable Court for entry of an order extending and modifying the Court's February 19, 2025 discovery schedule (Dkt. 41). Plaintiff does not oppose this motion for extension and modification. In further support, Defendants state as follows:

1. On February 13, 2025, the parties filed an initial status report. *See* Dkt. 38. The initial status report set April 25, 2025 as the First date to issue written discovery. Dkt. 38.

2. On February 19, 2025, the Court ordered that the Parties “(1) serve answers to discovery requests (including the production of non-ESI discovery) by May 30, 2025; (2) confer about the adequacy of the discovery responses by June 13, 2025; and (3) file a joint status report by June 20, 2025.” *See* Dkt. 41.

3. On April 4, 2025, Plaintiff filed a First Amended Complaint. *See* Dkt. 57.

4. On April 22, 2025, Plaintiff filed a Second Amended Complaint. *See* Dkt. 63.

5. Defendants filed their answers and affirmative defenses to the Second Amended Complaint on May 6, 2025 pursuant to Federal Rule of Civil Procedure 15(a)(3).

6. In the course of preparing answers to Plaintiff’s Second Amended Complaint, the parties agreed to extend the deadline to issue written discovery to May 5, 2025. Thus, the parties issued initial written discovery requests on May 5, 2025.

7. Under Federal Rule of Civil Procedure 33, the parties’ responses to written discovery are due on June 4, 2025.

8. Federal Rule of Civil Procedure (6)(b)(1)(A) allows deadlines to be extended, for good cause, if the motion for extension of the deadline is filed on or before the deadline.

9. Written discovery is extensive as the events at issue in this litigation occurred decades ago in the late 1980s. The parties are working cooperatively to move written discovery forward. The parties propose the following modification to the Court’s February 19, 2025 Minute Order (Dkt. 41):

a. Parties to serve answers to initial discovery requests (including the production of non-ESI discovery) by **June 25, 2025**;

b. Parties to confer about the adequacy of the discovery responses by **July 9, 2025**;

c. Parties to file a joint status report by **July 16, 2025**

10. This motion is made in good faith, by agreement of the parties, and not in an attempt to delay any proceedings.

WHEREFORE, Defendants, City of Waukegan, Lucian Tessman, Donald Meadie, David Yarc, Michael Taylor, Robert Winston, Kevin Runyard, Richard Davis, Philip Stevenson, Patrick Haley, John Reid & Associates, Inc., Michael Masokas, and Mark Reid respectfully request this Honorable Court enter an order extending and modifying the discovery schedule previously ordered on February 19, 2025 (Dkt. 41) consistent with parties proposed schedule and for any other and further relief the Court deems appropriate and just.

Respectfully submitted,

Defendants, John Reid & Associates, Inc.,  
Michael Masokas, and Mark Reid

By: /s/ Michael P. Gerkin

Michael P. Gerkin, one of their attorneys.

**SWANSON MARTIN & BELL, LLP**

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